## 8/31/2005

Federal Communications Commission

RE: NPRM&O in WT Docket 05-235

To whom it may concern:

In response to Section I.3 I make the following comments.

Regarding (1) – In no way does removing the code encourage someone to get a license so that they can advance the radio art. While a code requirement might prohibit some from advancing their license class, they can still obtain a Technician license. In addition, the current 5 wpm requirement is attainable by nearly all and does not represent a significant hurdle. In fact, 5 wpm used to be the requirement for handicapped applicants who were unable to pass a 13 or 20 wpm test. Of the handicapped operators I know, they were all proud of their accomplishment.

Regarding (2) - My guess is that those in favor of the NPRM&O for the most part have never operated CW. The Morse Code is a superior mode when communications have to get through. It works when other modes do not and requires a minimum of equipment.

However, it does require proficiency. I do not know of anyone who loves CW that didn't learn to love it and subsequently appreciate it. It certainly qualifies as "advancing their skills". If you don't advance your operating skills, what have you accomplished?

Regarding (3) – I cannot understand how it would promote more efficient use of the radio spectrum to get rid of the requirement for the most efficient mode there is.

That said, there has normally been a way for those interested in amateur radio to get their feet wet in HF. If it is found that 5 wpm is too great a hurdle to overcome, and that as an operating mode it has no value, then perhaps it should be gotten rid of so as to accommodate those who wish to

expend the least effort. I assume with that the commission would make it a rule that repeaters could no longer ID in CW so that operators would all be able to understand what system they are listening to.

As a compromise, and since no new license class is being contemplated, perhaps it would make sense to remove the Element 1 from a General requirement, but leave it for Extra. An Extra Class license means it is for those who have gone the extra mile. It does not make sense to reduce the requirement for all license classes when the objective appears to be garnering interest from new hams. Leave the greater privileges for those who exhibit a greater effort both in technical knowledge and in operating skill.

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